U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Superior Barrel and Drum - Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region II

Subject: **POLREP #12**
HazCat Complete, Action Memo Signed, Commence Composite Sampling
Superior Barrel and Drum

Elk, NJ
Latitude: 39.6930670 Longitude: -75.1345550

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From: Keith Glenn, OSC/Environmental Scientist
Date: 11/24/2013
Reporting Period: November 18, 2013 through November 24, 2013

1. Introduction

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1.1 Background

Site Number:	A23K	**Contract Number:**	EP-S2-10-01
D.O. Number:		**Action Memo Date:**	11/22/2013
Response Authority:	CERCLA	**Response Type:**	Emergency
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	8/30/2013	**Start Date:**	9/27/2013
Demob Date:		**Completion Date:**	
CERCLIS ID:	NJD986630705	**RCRIS ID:**	
ERNS No.:		**State Notification:**	8/29/2013
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category

A Removal Action is required to identify remaining hazardous materials that are on-Site and properly contain and dispose of such.

1.1.2 Site Description

On August 29, 2013 the New Jersey Department of Environmental Protection (NJDEP) notified the United States Environmental Protection Agency (EPA) Region 2 Regional Emergency Operations Center (REOC) of deteriorated conditions at the Superior Barrel and Drum Site. NJDEP Emergency Response personnel requested the assistance of EPA On-Scene Coordinators (OSCs) with investigating conditions of containers at the facility.

On August 30, 2013 EPA OSCs met with NJDEP and Gloucester County officials at the Superior Barrel and Drum Site. Observed were thousands of containers, mostly 275-gallon totes and 55-gallon drums, located along a public road as well as in the woods, wetlands, and elsewhere throughout the property. Containers were stacked several high in various locations and were shown to be various states of deterioration. Containers were found to be leaking, void of tops, exposed to weather elements, rusted, damaged due to gunshots, stored improperly, and laying on their sides. Numerous trailers were also found to be open and containing 55-gallon drums. The containers throughout the Site appeared to be full of contents, however most did not have labels. Labels on some containers include flammable liquids, corrosive, marine pollutant, flammable solid, oxidizer, and non-hazardous material.

NJDEP referred the Site to EPA on August 30, 2013 due to the conditions at the Site, including drum contents spilled in wetlands, contents pooling alongside the road, and unsecured access to the facility.

1.1.2.1 Location

The Superior Barrel and Drum Site is located at 798 Jacob Harris Lane in Elk Township, Gloucester County, New Jersey (coordinates 39.6869, -75.132314). The facility consists of a main processing building and numerous trailers located throughout the 5.5-acre property. The entrance to the facility is down a dirt road. The north end of the Site is bordered by Industrial Drum Company, a competitor in the drum reconditioning business. A chain-link fence separates the two properties. Jacob Harris Lane marks the eastern boundary of the Site, beyond which is a densely forested property. To the south are private lands which are also densely wooded with several marshy areas. The western boundary is State Route 55, a major highway. Currently, the facility is inoperable with last known operation activity occurring in 2012. Several companies have been to the property in efforts to remove machinery and equipment. The Site is open to persons traveling along Jacob Harris Lane, a public road. The Site is unsecured from each direction and evidence of trespassers has been noted. All doors of the main building and trailers are open.

The Site consists of two operational areas. The main area is where the permanent steel structure is located. This area would receive containers, rinse the containers, and recondition them for future market. This area is approximately 2.4 acres with containers located throughout. The additional operational area appears to be mainly for storage of full 275-gallon totes and 55-gallon drums, with

several trailers holding containers. This area encompasses approximately .32 acres of land. Both areas show signs of impact from leaking containers or dumping of materials.

1.1.2.2 Description of Threat

The facility is located in a federally recognized wetland. Thousands of containers are in various conditions of deterioration and leaking containers have been noted. Many labels on containers indicate contents of hazardous substances, however the property owner and his attorney have stated that the drums are of unknown contents. The facility is unsecured with access from a public road and surrounding trails. Shot-gun shells from target practice on containers are evidence of trespassers, along with signs of vandalism.

Companies that are located in the immediate area, along Jacob Harris Lane, are on private water wells. Residential properties located along Whig Road (<1/4 mile away) and Aurora Road (<1/2 mile) are also on private well water.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

NJDEP collected samples from four (4) random containers, all 55-gallon drums. Field screening tests were conducted on them using Photoionization Detectors, HazMat ID, pH, flash point, and others. Contents revealed materials to be corrosive, highly flammable, and having high readings of volatile organic compounds (VOCs). The materials sampled did not reflect the labels on the containers.

A Removal Assessment was completed on September 27, 2013. Approximately 252 containers were opened and aliquots were collected for HazCat. Field laboratory results indicated the presence of hazardous characteristics. Samples were collected from select drums and totes where they were shipped to NELAC accredited laboratories. Analytical results showed toluene, benzene, TCE, PCBs, lead, and many other hazardous substances make up the contents of the containers. Soil samples also showed attribution between the materials in the containers and that in the soil.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

The collection of aliquots for HazCat purposes was completed during the operational period. HazCat field screening analysis of samples was also completed. Composite samples were generated of neutral liquids in preparation for bulking activities. Additionally, all mercury was extracted from process equipment located around the incinerator.

Site personnel continued to move compromised totes out of the on-site structure and secure them in stable containers. Materials continued to be segregated by hazard class in designated cells located throughout the property.

EPA continued to work with numerous partners including the Gloucester County Fire Marshal's Office, HazMat Team, NJDEP, U.S. Fish and Wildlife, and local officials. NJDEP personnel continued weekly visitations and communication with Elk Township officials also continued. Security personnel continued to patrol the Site during non-operational hours.

2.1.2 Response Actions to Date

To view removal actions completed during other operational periods, please refer to previous Pollution Reports.

On November 18, 2013 the structural engineer submitted a report indicating the on-site structure was safe to be utilized for removal activities. Site managers designed warming cells to be built inside the structure for use during colder weather. This room-within-a-room will house the HazCat samples, bulking samples and containers that need to be transferred to DOT approved containers.

Additionally, EPA held meetings with the surrounding property owners to discuss on-going operations. The OSC addressed concerns such as press coverage, vandalism, potential migration of contamination, and future sampling opportunities.

Collection of aliquots for HazCat purposes was completed on November 19, 2013. This includes all drums extracted from tractor trailers, all totes inside the structure, and all containers that were found in the open environment. All HazCat field analysis was completed on November 22, 2013. Results have been tabulated in various databases which aid in the generation of bulking schemes.

The laboratory selected to perform analysis of composites visited the Site on November 22, 2013 to meet with on-site managers and chemists. The representative was given a tour of the sample processing area and was shown aliquots collected from various containers. This was to aware the laboratory of the various different materials they will be analyzing. Additionally, composite samples were generated from two separate neutral liquid waste streams, N1 and N3. Both classifications represent neutral liquids with N1 potentially containing just water and N3 potentially consisting of water and an organic layer in 50% of the column. A composite for the neutral series represent 35 containers from each sub-class. Samples were transported to the laboratory and will be analyzed for a host of parameters.

Additionally on November 22, 2013, field personnel inspected the incinerator that was used for burning drums during the reconditioning process. Numerous mercury containing switches were found throughout the equipment. All mercury bulbs were removed from the switches and properly stored in anticipation for future disposal.

The Action Memorandum was approved by the Region Administrator on November 22, 2013. For more information regarding this please refer to the Finance Section of this Pollution Report.

Throughout the operation al period RST continued to deploy and monitor perimeter air monitoring devices. RST also continued working with sampling crews and on-site chemists to maintain integrity of the field sampling and analytical logs. Information gathered from these sheets was entered into Response Manager, a database holding all information from each container. Response Manager allows on-site managers to determine bulking schemes.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

EPA has designated Bonnie Hriczko as the enforcement case officer. A 104(e) was drafted and submitted to the property owner. To date, no response was received from Thomas Toy. Because of this, ORC has drafted a Notice and Demand Letter to Superior Barrel. Additional legal actions to obtain information from Mr. Toy are also being reviewed. In addition, a 104(e) letter was drafted to Incineration Recycling Services of Camden. It has been learned that IRS of Camden has obtained assistance in addressing the information request.

Based on the document recovery and review project, hundreds of companies have been identified who performed transactions with Superior Barrel and Drum. These companies are being cross-referenced with business practices that indicate potential use or need of hazardous substances. Approximately 35 companies have been identified in this manner. Additionally, 98 individual companies have been identified through labels found on on-site containers. Several of these containers were found to contain hazardous substances.

2.1.4 Progress Metrics

The numbers below represent an approximation of individual containers that have been through the hazardous characterization field screening system. Many containers had multiple phases of materials which required multiple HazCats to identify the nature of each phase.

	Number of Aliquots for HazCat Collected[1]	Number of Confirmatory Samples*	Number of Surface Soil Samples*	Number of Surface Water Samples*
Cumulative Total	1966	79	36	4

[1]Several containers were opened but aliquot and sample collection was not possible. This count does

not include those containers.*Does not include duplicate samples or MS/MSDs for QA/QC.
The hazard class listed below is also an approximation based on information available at the time. Many samples were re-evaluated based on multiple phases and properties exhibited.

Haz Class	Acid	Neutral	Potential Oil	Flammable	Oxidizer	Base	Other	HazCat Complete
Cumulative Total	96	1228	257	369	31	116	12	1966

Waste Stream	**Sub-Class**	**CompositeSamples Collected**
Neutral		
	N1	1
	N2	0
	N3	1
	N4	0
	N5	0
	N6	0
	N7	0
FLAMMABLE		
	F1	0
	F2	0
	F3	0
	F4	0
	F5	0
	F6	0
	F7	0
	F8	0

The following table will be completed once transport and disposal operations begin.

Waste Stream	***Medium***	***Quantity***	***Manifest #***	***Treatment***	***Disposal***

2.2 Planning Section

2.2.1 Anticipated Activities

Collaboration between EPA, NJDEP, FWS, County, and local officials will continue throughout the removal activities of the Superior Barrel and Drum Site.

During the next operational period containers located inside the structure will be removed. Those that are other than neutral and found to be damaged will have contents transferred into secured containers. Construction of the warming cells will commence. Additionally, bulking schemes will continue to be developed based on the HazCat results. Composite samples will be collected and analyzed by an off-site NELAC accredited laboratory. Neutral liquids are being viewed as the first candidate since this represents approximately 50% of wastes currently on-site. This will also aid the development of tactical operations on addressing the more hazardous materials.

2.2.1.1 Planned Response Activities

During the next operational period field crews will continue to segregate materials into appropriately designated areas based on hazard class. This will create a more organized operation. The priority is the containers located inside the structure. These containers must be moved in order for construction to commence on the warming cells.

Field chemists and T&D coordinators will continue to develop the bulking schemes based on waste class. Personnel are focused with the neutral liquids as a primary means of establishing operational protocols. Once identified, small amounts of container content will be combined in the on-site laboratory and monitored for any reactions. If confirmed that no reactions have occurred, the composite sample will be sent to the laboratory and analyzed for a host of hazardous parameters. These results will aid in the proper disposal of materials.

The supplier of propane for Superior Barrel and Drum was contacted for the removal and recycling of propane tanks found on-site. The supplier will make arrangements with site managers for the removal of tanks in the next few weeks.

As short term goals are accomplished, operations will move into consolidating materials, waste removal, container destruction, inspection of potentially buried USTs and drums, and performance of additional soil investigations.

2.2.2 Issues

Several reports of vandalism have been reported at neighboring facilities along Jacob Harris Lane. Security patrols have been warned to remain vigilant.

The Site will be closed from November 23 through December 1, 2013 for the Thanksgiving and Chanukah holidays.

2.3 Logistics Section

All logistical issues are being handled by EPA Region 2, RST personnel or ERRS personnel.

2.4 Finance Section

2.4.1 Narrative

On September 4, 2013, $250,000 has been given to the Kemron ERRS contract to perform an emergency removal assessment.

On September 27, 2013, $600,000 was verbally authorized for the commencement of a Removal Action. The Action Memorandum is being drafted.

On November 22, 2013 the Regional Administrator approved the Action Memorandum documenting the verbal authorization of funding allocation, 12- month exemption, and request for ceiling increase. The AM provides for a total rpoject ceiling of $4,080,000 of which 3,500,000 is for mitigation.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Assessment	$250,000.00	$237,992.00	$12,008.00	4.80%
ERRS - Removal Action	$500,000.00	$325,860.00	$174,140.00	34.83%
TAT/START - RV	$100,000.00	$90,585.00	$9,415.00	9.42%
START - RA (Includ CLP)	$0.00	$184,969.00	($184,969.00)	0.00%
Intramural Costs				

Total Site Costs	$850,000.00	$839,406.00	$10,594.00	1.25%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

2.5.1 Safety Officer

Safety Officers have been identified through RST and ERRS. Health and Safety Plans have been completed by each contractor. Daily tailgate briefings are conducted.

From October 16 - 18, 2013 a Kemron Industrial Hygienist visited the Site and conducted a health and safety audit. Comments were addressed in the field and a report was generated on November 12, 2013. EPA conducted a health and safety audit on November 5, 2013. All recommendations were addressed following the report generated on November 6, 2013.

2.5.2 Liaison Officer

The OSC is acting Liaison Officer with local, State, and County officials.

2.5.3 Information Officer

Sophia Kelley has been designated as the Community Involvement Coordinator for the Superior Barrel and Drum Site. Ms. Kelley can be reached at 212-637-3670. Elias Rodriguez is the press coordinator and can be reached at 212-637-3664. Christopher Sebastian is the inter-governmental liaison and can be reached at 212-637-3597. George Zachos if the Regional Public Liaison and can be reached at 1-888-BUDSMAN.

A Community Update was approved by PAD on October 23, 2013.

Public Affairs and the OSCs are working together to generate a more robust and up-t-date external website highlighting removal operations.

3. Participating Entities

3.1 Unified Command

Unified Command is currently not being used.

3.2 Cooperating Agencies

EPA is coordinating efforts with various entities that have proven to be extremely helpful in the success of this project, including but not limited to:

- NJDEP
- Gloucester County HazMat Team and Department of Emergency Response
- Gloucester County Fire Marshal and Fire Department
- Police Department
- Glassboro Water Department
- Elk Township

4. Personnel On Site

EPA (1)
RST Contractors - Weston Solutions (1)
ERRS Contractors - Kemron (12)

5. Definition of Terms

Assisting and Cooperating Agencies - Agencies who are assisting the EPA response, but are not a part of Unified Command.

CERCLA - Comprehensive Environmental Response, Compensation and Liability Act of 1980 (42 U.S.C. Section 9601).

E Goods - Electronic machines which contain hazardous components.

Emergency Response - any activity undertaken by the Operations Section which mitigated an immediate threat to human health or the environment.

EPA - United States Environmental Protection Agency

ERRS - Emergency and Rapid Response Services contract.

FRP - Facility Response Plan. Under the Clean Water Act, as amended by the Oil Pollution Act, a plan for responding, to the maximum extent practicable, to a worst case discharge, and to a substantial threat of such a discharge, of oil. Required by certain facilities that store and use large quantities of oil.

FWS or **U.S. FWS** - United States Fish and Wildlife Service.

HazCat - Hazardous Categorization, a field technique which utilizes a series of chemical tests on samples collected in the field (aliquots) to determine the characteristics of hazardous and non-hazardous substances. The characteristics which can be determined include matrix (material state), solubility, combustibility, flammability, pH and the presence of oxidizers, peroxides, sulfides, PCB, cyanide.

Hazardous Debris - Debris which contains compounds that make it inappropriate for municipal landfill disposal

Household Hazardous Waste - Small quantity waste from households that contain corrosive, toxic, ignitable, or reactive ingredients is hazardous. This includes pesticides, paint, solvents, etc.

Monitoring - Using equipment which will give limited real-time information about constituents in environmental media. This method is used most often for air and water testing.

NELAC - National Environmental Laboratory Accreditation Conference.

NJDEP - New Jersey Department of Environmental Protection.

OSC - Federal On-Scene Coordinator.

OSHA - Occupational Safety and Health Administration.

PCBs - Polychlorinated biphenyls, a class of chemical compounds.

PPE - Personal protective equipment.

PRP - Potentially Responsible Party.

RCRA - Resource Conservation and Recovery Act.

REOC - EPA Region II Regional Emergency Operations Center.

RMP - Risk Management Plan. Under the Clean Air Act, certain facilities with large quantities of toxic potentially air born chemicals whose releases may impact human populations are required to submit to EPA a plan for hazard assessment, prevention, and emergency response.

RST - Removal Support Team contract.

Sampling -The process of taking environmental media for analysis at a laboratory of its constituents. These tests may require multiple days to complete, but test for a wider array of constituents than monitors.

Small Container - any container with a potential capacity of less than 5 gallons.

TRI - Toxic Release Inventory - A publicly available EPA database that contains information on toxic chemical releases and other waste management activities reported annually by certain covered industry groups as well as federal facilities. This inventory was established under the Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA) and expanded by the Pollution Prevention Act of 1990.

TCE - Trichloroethylene.

Unified Command - A structure based on the Incident Command System (ICS) that brings together the Incident Commanders of all major organizations involved in the incident in order to coordinate an effective response, while at the same time allowing each to carry out their own jurisdictional, legal, and functional responsibilities.

White Goods - Large home electronics such as refrigerators, washing machines, and dryers.

WW - Wastewater Treatment Facilities.

6. Additional sources of information

6.1 Internet location of additional information/report

www.epaosc.org/SuperiorBarrelAndDrum

http://www.epa.gov/region2/superfund/removal/superiorbarrel/

6.2 Reporting Schedule

At a minimum, POLREPS will be generated on a weekly basis. Should emerging situations need to be provided to parties, spot reports or bulletins will be sent via email.

As of September 26, 2013 daily updates were no longer provided.

The next POLREP will be distributed on December 8, 2013.

7. Situational Reference Materials

www.epaosc.org/SuperiorBarrelAndDrum

www.epa.gov/region2/superfund/removal/superiorbarrel/